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Attorneys for CATERPILLAR FINANCIAL SERVICES CORP.

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In re:

JOSHUA WILLIAM JOHNSON,

Debtor.

Bankruptcy No. 19-22674

Chapter 13

Honorable Joel T. Marker

## NOTICE OF APPEARANCE OF COUNSEL AND REQUEST FOR NOTICE

Pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, David H. Leigh of the law firm of Ray Quinney & Nebeker P.C. hereby enters his appearance as counsel of record for Caterpillar Financial Services Corporation ("CAT Financial"), a creditor of Joshua William Johnson, the debtor (the "Debtor") in the above-captioned chapter 13 case bankruptcy case (the "Bankruptcy Case"), requests that his name be included on the master mailing list in this case, and further request that notices of all hearings or actions in this case and copies of all motions, documents, or other papers filed by any party in interest in this case—including the Debtor, the chapter 13 trustee, and/or the U.S. Trustee—be sent to the following:

David H. Leigh, Esq.

RAY QUINNEY & NEBEKER P.C.

36 South State Street, 14<sup>th</sup> Floor
P.O. Box 45385

Salt Lake City, Utah 84145-0385

Telephone: (801) 532-1500

Facsimile: (801) 532-7543

E-mail: dleigh@rqn.com

PLEASE TAKE FURTHER NOTICE that the foregoing request for notice shall include notices by mail, telephone, facsimile, or any other means of electronic transmission, and the notices requested shall include, but are not limited to, all notices relating to the matters set forth in Fed. R. Bankr. P. 2002; matters relating to any hearing for conversion or dismissal under 11 U.S.C. § 1307; matters relating to adequate protection pursuant to 11 U.S.C. § 361; matters relating to the use, sale, or lease of estate property pursuant to 11 U.S.C. § 363; matters relating to requests for modification of the automatic stay pursuant to 11 U.S.C. § 362(a); matters relating to confirmation of any chapter 13 plan under 11 U.S.C. §§ 1324 and 1325; and matters relating to the discharge of the Debtor under 11 U.S.C. § 1328 or the dischargeability of certain debts under 11 U.S.C. § 523.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notice, and any subsequently filed pleading, claim, proof of claim, or suit is not intended nor shall be deemed to waive, where applicable, (i) CAT Financial's right to (a) have final orders in any core or noncore matters entered only after de novo review by a district court judge to the extent required by the United States Supreme Court's rulings of Stern v. Marshall, 131 S. Ct. 2594 (2011) and Executive Benefits Ins. Agency v. Arkison (In re Bellingham Ins. Agency), 134 S. Ct. 2165 (2014), any subsequent case law, and/or as otherwise required by the U.S. Constitution; (b) a trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; and (c) have the reference withdraw by the United States District

Court in any matter subject to mandatory or discretionary withdrawal; or (ii) any other right, claim, action, defense, setoff, or recoupment, all of which are hereby expressly reserved DATED this 10th day of June, 2019.

RAY QUINNEY & NEBEKER P.C.

/s/ David H. Leigh

David H. Leigh Attorneys for Caterpillar Financial Services Corporation

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2019, I electronically filed the foregoing *Notice of Appearance of Counsel and Request for Notice* with the Clerk of the Court using the Court's CM/ECF System, which in turn provided notice and/or a copy of the foregoing to all electronic filing users in this case.

I hereby further certify that on June 10, 2019, a copy of the foregoing was further served via U.S. Mail, first class postage prepaid, upon the following:

U.S. TRUSTEE
UNITED STATES TRUSTEE
WASHINGTON FEDERAL BANK BLDG.
405 S MAIN ST STE 300
SALT LAKE CITY UT 84111

LEE J. DAVIS LAW OFFICE OF DAVIS & JONES, PC 5663 S REDWOOD RD STE 1 TAYLORSVILLE UT 84123

LON JENKINS, CHAPTER 13 TRUSTEE 405 S MAIN ST STE 600 SALT LAKE CITY UT 84111 JOSHUA WILLIAM JOHNSON 10328 S SPRINGCREST LN SOUTH JORDAN UT 84095

/s/ Dianne Burton